IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

: CRIMINAL NO.

UNITED STATES OF AMERICA : DATE FILED: _____

v. : VIOLATIONS:

18 U.S.C. § 2113(a) (bank robbery - 2

JASON JOHNSON, : counts)

CLIFFORD JOHNSON 18 U.S.C. § 2113(d) (armed bank robbery

- 2 counts)

18 U.S.C. § 1951(a) (interference with

: interstate commerce by robbery)

18 U.S.C. § 2 (aiding and abetting)

:

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON JOHNSON

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the PNC Bank, 6855 Frankford Avenue, lawful currency of the United States, that is, approximately \$4,950, belonging to, and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JASON JOHNSON and CLIFFORD JOHNSON

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$900, from employees of the Commerce Bank, 8600 Germantown Avenue, belonging to, and in the care, custody, control, management and possession of the Commerce Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JASON JOHNSON and CLIFFORD JOHNSON

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$807, from employees of the Washington Savings Bank, 8729 Frankford Avenue, belonging to, and in the care, custody, control, management and possession of the Commerce Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Washington Savings Bank, and other persons, by use of a dangerous weapon, that is, a black BB gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2008, in King of Prussia, in the Eastern District of Pennsylvania, defendants

JASON JOHNSON and CLIFFORD JOHNSON

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$5,526, from employees of the Allegiance Bank, 190 East Dekalb Pike, belonging to, and in the care, custody, control, management and possession of the Allegiance Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Allegiance Bank, and other persons, by use of a dangerous weapon, that is, a black BB gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. The GNC Store, located at 2047 Cottman Avenue, in Philadelphia,

Pennsylvania, is a retail business that sells consumer goods and which is engaged in interstate

commerce.

2. On or about December 30, 2007, in Philadelphia, in the Eastern District of

Pennsylvania, defendants

JASON JOHNSON and CLIFFORD JOHNSON

obstructed, delayed and affected commerce and the movement of articles and commodities in

commerce, and attempted to do so, by robbery, in that, defendants unlawfully took and obtained,

and aided and abetted the unlawful taking and obtaining of, \$250 in United States currency from

the GNC in the presence of E.S. and against her will, by means of actual and threatened force,

violence, and fear of injury, immediate and future, to E.S., that is, by pointing a dangerous

weapon, that is, a black BB gun, at E.S. and demanding money.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN UNITED STATES ATTORNEY